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December 6, 2013

VIA ECF

Judge Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Alexander Emmanuel Rodriguez v. Major League Baseball et al., 13 Civ. 7097 (LGS)

Dear Judge Schofield:

We represent Plaintiff Alexander Rodriguez in the above-captioned matter, and write jointly with Defendants' counsel to request that, as a result of the Amended Complaint filed by Plaintiff on November 26, 2013, Plaintiff's motion to remand and Defendants' motion to dismiss be withdrawn, and that the parties be granted permission to file new motions to remand and to dismiss based on the Amended Complaint.

The parties propose to file moving papers on December 18, 2013 and papers in opposition/further support on January 17, 2014. This schedule will still permit the Court to hear argument on the motions at the conference scheduled for January 23, 2014. Alternatively, the parties are amenable to adjourning the conference to a later date if that is more convenient for the Court. This is the first request for an adjustment to the briefing schedule on these motions, and is made on consent of all parties.

We thank the Court for its attention to this matter.

Respectfully,

Vordan W Siev

cc: All counsel (via email and ECF)